

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

Headwater Research LLC,

Case No. 2:24-cv-00627-JRG-RSP

Plaintiff,

v.

JURY DEMANDED

Samsung Electronics Co., Ltd., et al.

Defendants.

JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

Pursuant to the Court's Order setting a deadline to file a proposed Protective Order (D.I. 24), Plaintiff Headwater Research, LLC and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. hereby jointly request that the Court enter the proposed Protective Order, attached hereto as Exhibit A.

Dated: December 2, 2024

/s/ Lawrence R. Jarvis

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SAMSUNG ELECTRONICS AMERICA, INC.

Respectfully submitted,

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**ATTORNEYS FOR PLAINTIFF,
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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 2nd day of December 2024, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Jason Wietholter
Jason Wietholter

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

/s/ Jason Wietholter
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